

**MARR JONES & WANG**  
A LIMITED LIABILITY LAW PARTNERSHIP

RICHARD M. RAND 2773-0  
SARAH O. WANG 6649-0  
Pauahi Tower  
1003 Bishop Street, Suite 1500  
Honolulu, Hawaii 96813  
Tel. No. (808) 536-4900  
Fax No. (808) 536-6700  
rrand@marrjones.com

Attorneys for Defendant  
MARRIOTT OWNERSHIP RESORTS, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

ANDREW GRANT; SANDRA  
DENISE GRANT; and ROBIN  
REISINGER,

Plaintiff,

vs.

MARRIOTT OWNERSHIP  
RESORTS, INC.; and DOE  
DEFENDANTS 1-100,

Defendant.

CIVIL NO. 16-00451 LEK-RLP

DEFENDANT MARRIOTT  
OWNERSHIP RESORTS, INC.'S  
**PROPOSED SPECIAL VOIR DIRE  
QUESTIONS; CERTIFICATE OF  
SERVICE**

Trial: December 4, 2018  
Judge: The Hon. Leslie E. Kobayashi

**DEFENDANT MARRIOTT OWNERSHIP RESORTS, INC.'S  
PROPOSED SPECIAL VOIR DIRE QUESTIONS**

Defendant MARRIOTT OWNERSHIP RESORTS, INC.

(“Defendant” or “MORI”) hereby submits its Proposed Special Voir Dire Questions to the Court.

DATED: Honolulu, Hawaii, November 20, 2018.

/s/ Richard M. Rand  
RICHARD M. RAND  
SARAH O. WANG

Attorneys for Defendant  
MARRIOTT OWNERSHIP  
RESORTS, INC.

**PROPOSED SPECIAL VOIR DIRE QUESTIONS**

1. Do you have any feelings about the vacation ownership industry that would affect your ability to be fair and impartial in this case?
2. Have you ever attended a vacation ownership (also referred to as “timeshare”) sales presentation?
3. If you have, do you believe you can still be fair and impartial in this case?
4. Do you or anyone in your family own a vacation ownership interest? Have you ever purchased a vacation ownership interest?
5. If so, do you believe you can still be fair and impartial in this case?
6. Have you ever been fired from a job?
7. If so, did you believe your employer acted properly? Do you believe you were fired because of your race or another illegal reason? Do you believe you can still be fair and impartial in this case?
8. If the evidence in this case shows that part of the reason for the Plaintiffs’ termination was for missing days of work, would you be willing to accept that as a legitimate reason even if they were sick on any of those days?

9. If the evidence in this case shows that part of the reason for the Plaintiffs' terminations was poor sales results, would you be willing to accept that as a legitimate reason?

10. If the evidence shows that the Plaintiffs were fired for reasons that you personally do not agree with, will you be able to find for the Defendant if the evidence shows race was not the reason Plaintiffs were fired?

11. Do you understand the Plaintiffs must prove each element of their claims and if they do not you must return a verdict for the Defendant?

12. In this case, the Plaintiffs all claim that they were discriminated against on the basis of their race, Caucasian. Do you understand that they are required to prove that the Defendant intended to discriminate against them?

13. In this case, the Plaintiffs all claim that their sales performance was negatively affected due to alleged racial discrimination. Will you be able to require them to prove that the Defendant intended to negatively affect their sales performance based on their race?

14. Plaintiffs Grant and Kelly claim that the Defendant created a racially hostile work environment. Will you be able to understand that they must prove more than isolated comments and that a reasonable person of the same race would find the comments to have created a hostile work environment?

15. Do you think that isolated racial comments at work amount to unlawful harassment?

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CIVIL NO. 16-00451 LEK-RLP

CERTIFICATE OF SERVICE

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing document was duly served upon the following:

*Served electronically through CM/ECF:*

ELIZABETH JUBIN FUJIWARA, ESQ. ejfujiwara.law1@gmail.com  
JOSEPH T. ROSENBAUM, ESQ. jtr@frlawhi.com

Attorneys for Plaintiff  
SANDRA DENISE KELLY

CHARLES H. BROWER, ESQ. honlaw@lava.net

Attorney for Plaintiff  
ANDREW GRANT

MICHAEL P. HEALY, ESQ.      [honolululawyer@outlook.com](mailto:honolululawyer@outlook.com)

Attorney for Plaintiff  
ROBIN REISINGER

DATED:    Honolulu, Hawaii, November 20, 2018.

/s/ *Richard M. Rand*

RICHARD M. RAND  
SARAH O. WANG

Attorneys for Defendant  
MARRIOTT OWNERSHIP  
RESORTS, INC.